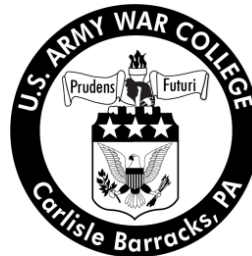


Palestinian-Israeli Conflict: Department of Defense Role in a Two-State Solution

by

Colonel Keith A. Casey
United States Army



United States Army War College
Class of 2013

DISTRIBUTION STATEMENT: A

Approved for Public Release
Distribution is Unlimited

This manuscript is submitted in partial fulfillment of the requirements of the Master of Strategic Studies Degree. The views expressed in this student academic research paper are those of the author and do not reflect the official policy or position of the Department of the Army, Department of Defense, or the U.S. Government.

The U.S. Army War College is accredited by the Commission on Higher Education of the Middle States Association of Colleges and Schools, 3624 Market Street, Philadelphia, PA 19104, (215) 662-5606. The Commission on Higher Education is an institutional accrediting agency recognized by the U.S. Secretary of Education and the Council for Higher Education Accreditation.

REPORT DOCUMENTATION PAGE				Form Approved OMB No. 0704-0188	
<p>The public reporting burden for this collection of information is estimated to average 1 hour per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding this burden estimate or any other aspect of this collection of information, including suggestions for reducing the burden, to Department of Defense, Washington Headquarters Services, Directorate for Information Operations and Reports (0704-0188), 1215 Jefferson Davis Highway, Suite 1204, Arlington, VA 22202-4302. Respondents should be aware that notwithstanding any other provision of law, no person shall be subject to any penalty for failing to comply with a collection of information if it does not display a currently valid OMB control number. PLEASE DO NOT RETURN YOUR FORM TO THE ABOVE ADDRESS.</p>					
1. REPORT DATE (DD-MM-YYYY) xx-03-2013		2. REPORT TYPE STRATEGY RESEARCH PROJECT		3. DATES COVERED (From - To)	
4. TITLE AND SUBTITLE Palestinian-Israeli Conflict: Department of Defense Role in a Two-State Solution				5a. CONTRACT NUMBER	
				5b. GRANT NUMBER	
				5c. PROGRAM ELEMENT NUMBER	
6. AUTHOR(S) Colonel Keith A. Casey United States Army				5d. PROJECT NUMBER	
				5e. TASK NUMBER	
				5f. WORK UNIT NUMBER	
7. PERFORMING ORGANIZATION NAME(S) AND ADDRESS(ES) Grace Carolyn Stettenbauer Department of National Security and Strategy				8. PERFORMING ORGANIZATION REPORT NUMBER	
9. SPONSORING/MONITORING AGENCY NAME(S) AND ADDRESS(ES) U.S. Army War College 122 Forbes Avenue Carlisle, PA 17013				10. SPONSOR/MONITOR'S ACRONYM(S)	
				11. SPONSOR/MONITOR'S REPORT NUMBER(S)	
12. DISTRIBUTION / AVAILABILITY STATEMENT Distribution A: Approved for Public Release. Distribution is Unlimited.					
13. SUPPLEMENTARY NOTES Word Count: 6,184					
14. ABSTRACT <p>The "Palestinian question" is important not only to Palestinians and Israelis, but to many countries and non-state actors in the region and around the world, to include the U.S. U.S. policy toward the Palestinians is marked by efforts to establish a Palestinian state through a negotiated two-state solution to the Palestinian-Israeli conflict and to establish norms of democracy, accountability, and good governance within the Palestinian Authority. The continuous violence between Palestinian militants and the Israeli Defense Forces has disrupted the peace process. Until the Palestinian government establishes complete authority in both the West Bank and Gaza strip, peace cannot not be attained. An integral part of Palestinian authority is the provision of credible security forces. Within this context, an opportunity has emerged for the Department of Defense, as the lead agency, to provide security assistance to develop a long-term counter-terrorism capacity and capabilities. This paper examines the whole of government efforts to assist in the Palestinian security force development. Recommendations are presented to transition the program into the next logical phases and prepare it for future requirements.</p>					
15. SUBJECT TERMS Israel, Palestine, Peace Process, U.S. Security Coordinator, Security Assistance					
16. SECURITY CLASSIFICATION OF:			17. LIMITATION OF ABSTRACT UU	18. NUMBER OF PAGES 36	19a. NAME OF RESPONSIBLE PERSON
a. REPORT UU	b. ABSTRACT UU	c. THIS PAGE UU			19b. TELEPHONE NUMBER (Include area code)

USAWC STRATEGY RESEARCH PROJECT

Palestinian-Israeli Conflict: Department of Defense Role in a Two-State Solution

by

Colonel Keith A. Casey
United States Army

Grace Carolyn Stettenbauer
Department of National Security and Strategy
Project Adviser

This manuscript is submitted in partial fulfillment of the requirements of the Master of Strategic Studies Degree. The U.S. Army War College is accredited by the Commission on Higher Education of the Middle States Association of Colleges and Schools, 3624 Market Street, Philadelphia, PA 19104, (215) 662-5606. The Commission on Higher Education is an institutional accrediting agency recognized by the U.S. Secretary of Education and the Council for Higher Education Accreditation.

The views expressed in this student academic research paper are those of the author and do not reflect the official policy or position of the Department of the Army, Department of Defense, or the U.S. Government.

U.S. Army War College
CARLISLE BARRACKS, PENNSYLVANIA 17013

Abstract

Title: Palestinian-Israeli Conflict: Department of Defense Role in a Two-State Solution

Report Date: March 2013

Page Count: 36

Word Count: 6,184

Key Terms: Israel, Palestine, Peace Process, U.S. Security Coordinator, Security Assistance

Classification: Unclassified

The “Palestinian question” is important not only to Palestinians and Israelis, but to many countries and non-state actors in the region and around the world, to include the U.S. U.S. policy toward the Palestinians is marked by efforts to establish a Palestinian state through a negotiated two-state solution to the Palestinian-Israeli conflict and to establish norms of democracy, accountability, and good governance within the Palestinian Authority. The continuous violence between Palestinian militants and the Israeli Defense Forces has disrupted the peace process. Until the Palestinian government establishes complete authority in both the West Bank and Gaza strip, peace cannot not be attained. An integral part of Palestinian authority is the provision of credible security forces. Within this context, an opportunity has emerged for the Department of Defense, as the lead agency, to provide security assistance to develop a long-term counter-terrorism capacity and capabilities. This paper examines the whole of government efforts to assist in the Palestinian security force development. Recommendations are presented to transition the program into the next logical phases and prepare it for future requirements.

Palestinian-Israeli Conflict: Department of Defense Role in a Two-State Solution

Conflict in the Middle East has been an enduring U.S. national security concern since the region came to the forefront of our foreign policy following the 1947 United Nations partition plan (General Assembly Resolution 181). The “Palestinian question” is important not only to Palestinians and Israelis, but to many countries and non-state actors in the region and around the world, to include the U.S. The U.S. policy toward the Palestinians is marked by efforts to establish a Palestinian state through a negotiated two-state solution to the Palestinian-Israeli conflict and to establish norms of democracy, accountability, and good governance within the Palestinian Authority.¹ More recently, attempts to secure lasting peace between Israel and Palestine through a Two-State Solution² have been central to U.S. diplomatic actions within the region. While the U.S. has taken a comprehensive approach to resolve the conflict, there is an obstacle in furthering the agenda – security.

Within the U.S. government, the Department of State (DoS) is the lead agency for foreign policy. In peacetime, the Department of Defense (DoD) manages security assistance programs to reinforce policy and diplomatic objectives and promote regional stability. Most often these programs are designed to increase the military capacity and capabilities of foreign partners through training and material support.³

However, in times of crisis, conflict, and war, DoD becomes more prominent, often assuming a temporary leading role. DoD aims to ensure allied victory and degrade enemy capabilities in order to establish a sufficiently secure setting in which diplomacy can resume. While DoD does not have the lead in determining U.S. foreign policy, establishing security and stability is a fundamental provision for successful political resolution and is most effectively undertaken by the military.⁴

However, how is the DoS-DoD lead-support relationship altered when the unstable security environment exists between two governments, both nominally aligned to the U.S. and to U.S. interests? What if U.S. foreign policy goals include the requirement for both governments to succeed? This is precisely the situation in which we find ourselves regarding the Palestinian-Israeli conflict.⁵

The U.S. acknowledges that an enduring, peaceful resolution to the conflict will only be achieved through diplomatic agreement and mutual compromise between the Palestinian and Israeli governments. Despite comprehensive efforts, the 2007 geographical and factional split between Fatah and Hamas and violence has been the greatest obstacle to the Peace Process⁶. Diplomatic efforts have been unable to obtain sufficient security to allow either government to conclude an enduring political settlement.

The intent of this paper is to propose that the U.S. must place more emphasis on shaping the Palestinian-Israeli security environment. Specifically, DoD must commit itself to a long-term approach to increase the capacity and capability of the Palestinian Authority Security Forces (PASF) and institutions. This will require a reexamination of the Departments of State and Defense authorities (including statutory authorities) and constraints in order to develop programs best suited to this long-term approach.

To understand this proposal, this paper provides a historical overview of the Two-State concept. This overview highlights how security has emerged as the foundational element of the Two-State policy of the U.S. and underscores the critical role of Department of Defense security assistance. Finally, current assistance programs for the PASF are examined and recommendations are made to enhance these efforts.

This paper does not suggest a military intervention into the Palestinian-Israeli conflict, nor is it a critique of past or present U.S. policy. Moreover, it does not presume that a more favorable security environment will automatically and ultimately guarantee a final conclusion to the political struggle.⁷ Rather, it exhibits that a unique political-military atmosphere has emerged in which it would be appropriate for Department of Defense to serve as a leading element of foreign policy.

To understand this approach, it is necessary to develop an appreciation of how events in recent decades have altered the context of the Peace Process and amplified the role of security in these changes. Distinguishing security as the principal issue for U.S. efforts requires a general awareness of a credible Two-State Solution to this conflict.

While hostility and violence were in the region well prior to 1948, conflict between the recognized State of Israel and surrounding Arab countries began at the moment Israel declared its independence. Despite the United Nations' intent in 1947 of creating two states - one Arab and one Jewish - only the Jewish state came into being. For most, it may seem farfetched that in the past 62 years an equitable, political compromise has not been reached, allowing for the creation of these two states – one for Israelis and one for Palestinians. This protracted and sorrowful course can be ascribed, in part, to the absence of a principal component needed for any peace plan to succeed – a single authoritative organization within the Palestinian lands, that represents and protects the political, economic, societal, and security interests of the Palestinian people and recognizes the legitimacy of the State of Israel. Lacking this,

there was little prospect for the much hoped-for peaceful division of British Mandate Palestine.

Well before 1947 partition of the Mandate, the Jewish community in Palestine possessed all the ingredients necessary to make the transition to statehood. Political control was conducted through the Jewish Agency, founded in the 1920s and which became the Government of Israel at Independence.⁸ Economic and social affairs were largely represented by the labor organizations (Histadrut)⁹ and the socialist agricultural networks (kibbutzim and moshavim),¹⁰ that later became the basis for Israel's modern economic and union systems. Security was provided by local militias, as well as military organizations, which were united in 1948 to form the modern-day Israeli Defense Forces.¹¹

Conversely, following the partition, the Palestinian people tended to reside in areas that were neither economically viable nor geographically suited for national governance or defense. At the conclusion of the Israeli War of Independence in 1948, Palestinian local government, economy, and society were further fractured. Under terms of the peace treaty, Palestinian territories were partitioned yet again. The State of Israel acquired additional territory, as did Jordan and Egypt.

Palestinian Arabs within Israel acquiesced to Israeli government or were forced to become refugees.¹² Western Palestine became part of the Hashemite Kingdom of Jordan. Lands east of the Jordan River were incorporated into Transjordan and Palestinian Arabs were granted Jordanian citizenship. Lands west of the Jordan River were annexed under Jordanian administrative control and became known simply as the West Bank.¹³ As part of the cease-fire agreement, Israel consented to an Egyptian

military presence in southwest Palestine, known as the Gaza Strip.¹⁴ After 1949, the name Palestine could no longer be found on the maps of any of the three countries.¹⁵

Israel and the surrounding Arab nations went to war again in 1956, 1967, and once more in 1973. These wars resulted in the expulsion of both Jordan and Egypt from their Palestinian landholdings. The Israeli government and military occupied and established administrative and security control for both the West Bank and Gaza. By 1973, not a single element existed from which a Palestinian state could be formed.¹⁶

However, several events occurred in the period following these conflicts that renewed the prospect of Palestinian statehood. In 1974, the Palestine Liberation Organization (PLO - the Palestinian “government in exile” located in Tunisia) was designated the sole, legitimate representative of Palestinians, wherever they lived.¹⁷ In 1977, the Palestinian National Council (PNC – the political arm of the PLO) called for an “independent national state in any part of Palestine;” implicitly accepting that Palestinian statehood was not mutually exclusive of the State of Israel.¹⁸ In conformity with the 1978 Camp David Peace Accords, Egypt relinquished authority over the Gaza Strip,¹⁹ leaving the fate of Palestinian autonomy as a matter for future negotiations. Similarly, the Government of Jordan renounced jurisdiction of all Palestinian lands and peoples in the West Bank in 1988,²⁰ thereby removing itself from direct deliberation regarding Palestinian statehood. Later that year, the PNC declared independence for the Palestinian state and accepted the specifications of U.N. Security Council Resolutions 242 and 338, thereby explicitly recognizing the Israeli State.²¹

As a result of the 1994 Oslo accords, the Palestinian National Authority (PNA – more commonly known as the Palestinian Authority (PA)) was created to serve as the

local Palestinian government within the Occupied Palestinian Territories.²² Later that year, Israel allowed PLO Chairman and PA President Yasser Arafat and the PA to enter the Occupied Territories as the interim governing body until a permanent government could be created. Two years later, the PNC revised the PLO Charter, explicitly removing language that had previously questioned Israel's legitimacy.²³

In 1996, it appeared as though the Palestinians had crossed significant hurdles toward statehood. In the PA, they possessed a single authoritative institution. The PA was an internationally recognized local governing body. The Palestinian national charter and policy conceded Israeli sovereignty. Yet, to this day Palestinians do not hold autonomy over their economy, society, and security.

The failure to resolve "Final Status" issues is seen by many as the primary reason for the breakdown of the Peace Process and prevents the emergence of an independent Palestinian state. The resolution of Palestinian-Israeli borders, the rights of Palestinian refugees, the status of Jerusalem, disposition of Israeli settlements in the West Bank, and equitable use of water must be part of any final peace agreement. However, it is not these issues alone that have suspended the Peace Process. To presume it is simply the inability of Palestinians and Israelis to address "final status" issues would be to ignore substantial peace agreements and initiatives of the past two decades, particularly the two Oslo Accords and the 2003 Road Map for Peace.

These peace agreements were never intended to conclusively resolve each aspect of "final status," but simply outlined an incremental agenda to transition Occupied Palestine to statehood. This approach was agreed upon by both parties and set forth a pragmatic and gradual evolution toward Palestinian autonomy. The failure to

maintain a secure environment during the implementation of these plans ended each endeavor.

Israeli Prime Minister Yitzhak Shamir once stated that: "Security takes precedence over peace."²⁴ Not much has changed in the 27 years since his statement. From the Israeli perspective, defining and addressing the security threat is fairly straightforward. Violence emanates from armed militants within Palestinian areas and must be contained with military force. Control of the Palestinian government, citizens, economy, and land by the Israeli Defense Forces and territorial authorities²⁵ is a necessary tool. Through the occupation, Israel is able to preserve an acceptable level of security.

The Israeli government is apprehensive that increased Palestinian autonomy through concessions to the Peace Process undermines Israel's primary instrument for maintaining control and carries the genuine risk of worsening security. Whereas the need to coerce Palestinian compliance with this security regime is objectionable, there is scarce incentive to hazard any far-reaching adjustments for the time being.

From the perspective of the Palestinian militants, Israel wages political, economic, and social warfare through the occupation, in order to prevent Palestinian sovereignty. To many militants, the very existence of a Jewish state on Arab soil is intolerable. Unable to compete proportionally with Israel's considerable resources, these terrorists resort to the use of violence as the means to bring about the destruction of Israel and achieve statehood.

The Oslo Accords, Road Map for Peace, and U.S. policy all specify that security must be addressed first and foremost for Palestinian-Israeli relations to improve.

Security entails not only the cessation of violence between Israeli and Palestinian security forces (which has already been achieved), but also a willingness on the part of the PA government to eradicate violent rejectionist elements within Palestinian territories (such as Hamas, the Popular Front for the Liberation of Palestine (PFLP) and the Palestinian Islamic Jihad (PIJ)). Security also requires that prepared and capable Palestinian security forces prevent external agents seeking the destruction of the Israeli State (such as Hezbollah) from entering and using Palestinian lands as staging grounds for attack.

Although a meaningful peace can only occur as a matter of consent and compromise between the two governments, U.S. involvement is singularly important for several reasons. As the explicit underwriter of Israeli regional security, only the U.S. is in a position to provide the Israeli government with sufficient inducements to accept the risk of increasing the capability of the Palestinian security forces. For Palestinians, it is the U.S. willingness to work toward their statehood, along with our ability to persuade Israel to take these risks, which creates the need for this partnership.²⁶ The state of affairs between Israelis, Palestinians, and the U.S. is, as one senior military officer described, a careful balance between “Israeli caution,” “Palestinian impatience,” and “hope;” in other words – Security, Statehood, and Trust.²⁷

Prior to Oslo the Accords, the U.S. provided no overt assistance to the government of Yasser Arafat and the PLO.²⁸ In 1993, with the creation of the Palestinian Authority, the U.S. initiated programs to transform Arafat’s Palestinian Liberation Army (PLA) and other security and intelligence organizations into a single internal security force to conduct police and counter-terrorism operations.²⁹ Through

1995, the U.S. provided nearly \$5 million toward this effort,³⁰ but relied primarily on regional and European nations to supply the majority of the resources and all security force training.³¹ In 1996, in light of increasing Palestinian violence against Israel, President Clinton authorized U.S. agencies to provide direct aid to assist in restoring stability and subduing terrorist groups.³² For the next several years, relative calm returned.

In March 2003, a multinational group known as the Quartet, consisting of the U.S., the European Union, the United Nations, and Russia, endorsed the “Road Map for Peace” and began to solicit international assistance to fulfill its provisions. Unlike preceding peace plans, the Road Map was brief and concise. It included tightly-phased sets of “performance-based” and “goals-driven” objectives.³³ The plan called for broad-ranging support to reorganize and reform Palestinian institutions across the government and ambitiously set 2005 as the year to conclude a final status agreement and put an end to the conflict. Additionally, the Road Map stipulated support from the international community and specified the responsibilities of countries providing donor assistance.

During a meeting in early 2005, the Quartet reviewed performance benchmarks outlined in the Road Map, as well as the previous commitments made by leading donor nations. The Quartet gave scrupulous attention to the following elements from the Road Map: “implementation, as previously agreed, of U.S. rebuilding, training, and resumed security cooperation plan in collaboration with outside oversight board (U.S.-Egypt-Jordan),” and “Restructured/retrained Palestinian security forces and IDF counterparts progressively resume security cooperation...including regular senior-level meetings, with the participation of U.S. security officials.”³⁴

Conspicuously, in early 2005 there was no U.S. effort in place to rebuild and train Palestinian security forces, nor were any U.S. security officials designated to conduct senior leader meetings. Within days, the Office of the U.S. Security Coordinator (USSC) was created and the Defense Department was given the mission.

In March 2005, the USSC was established with offices at the U.S. Embassy in Tel Aviv, Israel, and given the mission to “coordinate international donations and mobilize resources toward restructuring and properly training a single Palestinian security force.”³⁵ Created through a joint Memorandum of Agreement between Departments of State and Defense, the USSC operates under the authority and funding of the Department of State. Initially led by General William Ward, the USSC served as liaison between the Israeli and Palestinian Ministries of Defense and Interior.

From March to December 2005, the USSC facilitated four key events. First, the USSC facilitated the transfer of the Gaza Strip security mission to PA Security Forces (PASF) following the final withdrawal of Israeli settlers.³⁶ Second, the USSC coordinated the transfer of \$2.3 million worth of non-lethal aid to the PASF, including vehicles, radios, uniforms, and equipment.³⁷ Third, the USSC participated in negotiations concerning the Agreement of Movement and Access for Palestinian travel and commerce between Gaza and the West Bank.³⁸ Finally, the USSC organized three international donor conferences with European and Arab counterparts to increase funding and reduce duplication of efforts; and completed the first in-depth analysis of the status and future requirements for PASF reform and training.

The most important accomplishment during this period, however, was the considerable trust and confidence built between the Israelis, Palestinians, USSC team,

European allies, and neighboring Arab countries. Under the auspices of a European monitoring mission, Israeli and Palestinian security units co-occupied border and immigration control points and a joint command center to manage security, civilian movement, and commercial traffic from Egypt into Gaza, as well as from Gaza to the West Bank. Not a single incident of violence between Israelis and Palestinians occurred during the Israeli withdrawal from the settlements in Gaza. Israeli customs officials expedited the release of the backlogged international security assistance equipment donations to the Palestinian Authority, as did the Government of Egypt. Israeli, Palestinian, Egyptian, Jordanian, U.S., and European security officials met on numerous occasions to share information and confer on measures to increase border controls. Finally, the Palestinian Interior Ministry provided unprecedented access to security force personnel and pay records to guide international security sector reform efforts.

In December 2005, Lieutenant General (LTG) Keith Dayton was appointed as the new Coordinator and brought revised instructions “to professionalize and consolidate the PA forces and coordinat(e) their activity with Israeli officials pursuant to both sides’ obligations under the 2003” Road Map.³⁹ Using the Jordanian International Police Training Center (JIPTC – the same facility the U.S. had used to train Iraqi police until 2007⁴⁰) outside Amman, a 400-man Presidential Guard (PG) battalion was made ready to assume security duties at the Gaza Border crossing points into Israel.⁴¹

Recognizing that tactical unit training would not produce an enduring effect on Palestinian security institutions, General Dayton expanded the USSC mission beyond training assistance. He initiated programs to reform and build the organizational

capacity of the MOI, educate senior Palestinian security leaders, and improve security and training infrastructure throughout the West Bank.⁴² With this expanded undertaking, the USSC secured additional personnel and acquired a new principal location with to the U.S. Consulate General in Jerusalem.⁴³ Consulate General Jerusalem represents the U.S. to the Palestinian Authority.

In 2010 the USSC team consisted of 45 persons, including 16 DoD service members and civilians, and 29 military representatives from Great Britain (8), Canada (20), and Turkey (1).⁴⁴ Twenty-two contracted law enforcement experts provide Mobile Training Teams (MTT) to oversee the JIPTC training program. A 7-man security sector reform team provides on-site training and mentorship within the Palestinian MOI's Strategic Planning Division (SPD), which administers PASF recruiting, force management, and operational planning and deployment.⁴⁵

Although never allocated an independent assistance budget, the USSC secured reprogrammed and appropriated funds, primarily through the DoS's Bureau of International Law Enforcement and Narcotics and its International Narcotics Control and Law Enforcement (INCLE) funding.⁴⁶ Over the past five years, the USSC received: \$25 million (FY2008); \$184 million (FY2009); \$100 million (FY2010), \$150 million (FY2011), \$100 million (FY2012) and projected \$70 million in FY2013.⁴⁷ This money funded training, non-lethal equipment, and garrisoning assistance to PA security forces in the West Bank, supporting efforts by the U.S. Security Coordinator.⁴⁸

As of June 2012, eight full PA National Security Forces (NSF) special battalions (4,320 personnel) and two PG battalions (908 personnel) have been trained at the JIPTC. A ninth NSF battalion (500 personnel) is currently in training. Additionally, 410

members of the PA Civil Defense (firefighters and other emergency responders) have been trained in Amman at the Jordanian Academy of Civil Protection, and approximately 190 more are scheduled for training by October 2012.⁴⁹ The intent is for these NSF “gendarmerie-style” security battalions to gradually assume responsibility for security throughout West Bank from Israeli Defense Forces.⁵⁰ The withdrawal of the IDF from around Palestinian cities and towns (Oslo Accords areas A and B), as well as a gradual relaxation of the occupation regime, will have a pronounced effect on the West Bank economy and society. The visible presence of Palestinian security units should increase Palestinian confidence in the PA government and may begin to erode existing tolerance and support for terrorist organizations, such as PFLP and PIJ. The British contingent of the USSC in Ramallah works to improve the capacity, capability, and organization of the Palestinian Civil Defense (CD). The CD is the MOI’s first-responder branch and provides civilian emergency medical, ambulance, and fire department capability.⁵¹

The USSC coordinated construction of a Presidential Guard training college and an NSF training facility and barracks in Jericho. The intent is to expand the NSF facility to accommodate Palestinian Civil Police (PCP) training as well. Construction is complete on an NSF barracks in Jenin and more barracks are planned for other towns in the West Bank.⁵²

At the July 12, 2011, hearing before the House Foreign Affairs Subcommittee on the Middle East and South Asia, LTG Michael Moeller, who preceded VADM Paul Bushong as the U.S. Security Coordinator, outlined changes in emphasis for the USSC/INL program for FY2012. LTG Moeller stated, “this year, we will transition the

program into the next phase of our campaign plan: Building institutional capacity. This new phase is less resource intensive as we move away from primarily providing the Palestinian security forces with equipment and infrastructure toward an increasingly direct “advise and assist” role. In this phase, we will help the PASF develop indigenous readiness, training, and logistics programs and the capability to maintain/sustain their force structure readiness and infrastructure. Additionally, the USSC will continue to support other U.S. rule of law programs that assist the Palestinians to improve the performance of the Justice and Corrections Sectors.”⁵³

During the past five years, newly-trained and equipped PASF units operated within the West Bank without external assistance. In late 2007, the PG conducted a series of operations to contain violence against Israelis and target illegal militias. In 2008 and 2009, NSF battalions carried out active security missions in the West Bank towns of Nablus, Jenin, Hebron, and Bethlehem, focusing on law and order, patrolling, and counter-smuggling.⁵⁴ Despite widespread demonstrations during the 2008-2009 Israeli incursions into Gaza, NSF units maintained order and prevented civil disturbance throughout the West Bank.⁵⁵ The most striking aspect of these operations was the tremendous level of communication, cooperation, and coordination between the PASF and the IDF.⁵⁶ Israeli officials generally support the USSC program, routinely citing both the PA forces’ greater effectiveness as well as increased and sustained levels of security cooperation.⁵⁷

Despite these marked improvements in the Palestinian security forces, they are not without criticism. Palestinian security forces have been criticized for political targeting of Hamas and for corruption in the northern West Bank. In the town of Jenin,

previously hailed for its security progress, the security manager was cited as saying in May 2012 that the Palestinian leadership had previously turned its back to the corruption of security personnel in Jenin, allowing the situation to deteriorate at the expense of the people's security.⁵⁸

However, Palestinian Authority Interior Minister Said Abu Ali has been quoted as downplaying the overall significance of recent incidents in Jenin: "These are individual provocations ... it is not a phenomenon, and it has no political meaning."⁵⁹ One report asserted that despite these incidents, general security in Jenin remains much improved since 2007,⁶⁰ and many reports document ongoing efforts by the Palestinian authority to confront crime and security personnel corruption. Prime Minister Salam Fayyad, "What's going on now is patching the gaps (in security establishment) through a focused security effort."⁶¹

In partnership with the Palestinians and the Israelis, the USSC has embarked upon an unprecedented course. Never before has the U.S. so intently and directly taken action to address the security challenges faced by the Palestinian government. The efforts of the USSC have demonstrated that a long-term commitment to Palestinian security can make a difference. As of July 2011, the consolidation and training of Palestinian security forces is now institutionalized. During Nakba Day (May 2011) and Naksa Day (June 2011) demonstrations, the Israeli and Palestinian security forces demonstrated on-the-ground coordination for the first time since the outbreak of the Second Intifada in 2000⁶².

However, the scope of the current program is insufficient to advance security to a level that will allow the Israeli government to completely dismantle its security regime

within the West Bank and around the Gaza Strip. Until President Abbas and the Palestinian Authority have complete authority over the use of force within the Palestinian territories, to include the containment of terrorist militant groups, Palestinian statehood cannot be achieved.

The following sections outline measures that DoD and the broader U.S. government should take to enhance the current program and prepare for future requirements. Throughout the seven years since the USSC was formed, many recommendations have been made to improve the capability of the mission. The recommendations presented below provide a deeper analysis into some of these ideas and offer new concepts as well.⁶³

Several of the recommendations below suggest that the USSC should serve as a lead agent within the U.S. and the international effort. Within the context of this paper, a lead agent's authority is implicit and is not synonymous with authoritative command, as one would find in a military unit. The goal of lead agency is to achieve unity of effort. Unit of effort is defined as: "coordination and cooperation toward common objectives, even if the participants are not necessarily from the same command or organization."⁶⁴ Unity of effort is achieved through the common agreement of goals and priorities, and does not confer upon the lead agent the authority to dictate the actions of other organizations.

Recommendations for the near-term: the level of assistance provided within the previous USSC plan to train and equip ten NSF security battalions, to include 2 PG battalions, improve security infrastructure, and assist the reform efforts within the PA Ministry of the Interior has been accomplished.⁶⁵ Any plans to increase the scale of this

program at the present time would likely exceed the ability of the MOI to manage and sustain. Therefore, near-term improvements to the USSC should focus on institutionalizing the mission and preparing for expanded future requirements.

The Coordinator (chief of the USSC, currently Vice Admiral (VADM) Bushong) should have a DoD-recognized Joint Management Document (JMD) that includes the specifications of service, rank, and skill set. Personnel management within the USSC is based upon the interagency memorandum that limits the size of the U.S. contingent. Any temporary or permanent changes must be coordinated and approved by the signatories to the establishing memorandum. This limits the ability of the VADM Bushong to adapt the team's personnel strength and competencies to meet the changing requirements of the mission. A JMD would confirm the requirements for regional, language, training assistance, and intelligence expertise and the responsibility for the Services to train and prepare service members prior to their assignment.⁶⁶

In coordination with U.S. Consulate General Jerusalem, DoD should think ahead to the U.S.-Palestinian relationship after Palestinian statehood has been achieved and consider establishing a Defense Attaché's Office (DAO)⁶⁷ and an Office of Defense Cooperation (ODC).⁶⁸ The USSC conducts activities within one of the most complex operational environments and DAOs serve several invaluable roles that would support USSC operations. DAOs develop an understanding of the operational environment achieved through direct personal experience in the country. Through standardized reporting, DAOs conduct information sharing across departments and agencies within DoD. DAOs evaluate changes within the operational environment and would be able to

monitor the progress made by Palestinian forces and security developments within the Occupied Territories.⁶⁹

ODC personnel are trained to coordinate security assistance programs, arrange equipment transfers to partner nations, and monitor the use of said equipment. This is complicated for the USSC in that all these activities currently must be coordinated through the Israeli government. A permanent ODC in Jerusalem provide a cadre of experts in training assistance who could develop the long-term relationships with their Israeli counterparts.⁷⁰

The USSC should be authorized a dedicated budget from DoD. Palestinian Security Sector Reform is a long-term obligation that will take many years to accomplish. The USSC must plan and program resources well in advance for the Palestinian security force to achieve the operational capability. The current year-to-year funding provided by DoS is not adequate to project and commit funding, nor is it flexible or robust enough to respond to significant changes that arise.⁷¹

Within this dedicated budget, should be provisions offered to other high-priority missions. These provisions include; the ability to spend appropriated funds over several budget years and the authority to use funds to support non-military security organizations. Multi-year funding would provide the flexibility needed to adjust programs to the rate at which Palestinian security forces progress. The ability to fund civil a security force allows the USSC to train the NSF battalions in the advent they assume a law enforcement role. Finally, this dedicated budget provides the ability to fund the training PA civil police if they begin to work in close concert with the NSF.⁷²

The USSC is restricted from meeting with non-military government officials from either government without a DoS representative present, nor can meetings be held with Israeli officials in or along the boundary of the West Bank. The USSC conducts significant work with officials within both the Israeli and Palestinian governments. The non-military meeting is not needed, provided that USSC members do not discuss matters outside their immediate authority and do not make commitments on behalf of the U.S. government. As is currently occurring in Afghanistan and had occurred in Iraq, civil-military relations are crucial to the accomplishment of the USSC mission. The West Bank restriction has some validity as this is a standing U.S. policy to ensure that the U.S. does not appear to be complicit with the Israeli occupation. However, despite making sense from a political perspective, it complicates USSC's ability to gain an appreciation of "ground truth" from the Israeli perspective. Without the ability to understand the IDF ground commander's perspective, our requests will appear uninformed. While the authority for West Bank meetings must be severely limited, it should be left to the discretion of the Coordinator.⁷³

The Department of Defense should consider reestablishing the USSC as a Joint Task Force (JTF).⁷⁴ Establishing a JTF would alleviate most of the issues mentioned above, without counteracting the authority of the Consul General in Jerusalem or the Ambassador in Tel Aviv. Establishing a JTF would require DoD to take responsibility for the financial and personnel through individual augmentation orders, and would mandate the development of a Joint Manning Document.⁷⁵

If a JTF is adopted, DoD should consider establishing it as a Combined JTF (CJTF). Our International partners currently account for nearly two-thirds of the USSC.

Their contributions are immense, through the skills, knowledge, and experience they bring that are atypical of U.S. service members. Additionally, a CJTF would make it easier to institutionalize foreign partner contributions. Finally, although the USSC is performing its mission in superior fashion, it is still managed as an ad hoc, temporary organization. This point is not lost among our Palestinian, Israeli, and foreign military counterparts. The creation of a CJTF would demonstrate the permanence of our commitment and would reinforce the importance the U.S. places on its efforts.⁷⁶

Recommendations for the mid-term: the Palestinian security forces and the Ministry of the Interior are currently receiving as much assistance as they can manage. Newly-trained PASF battalions will undoubtedly continue to build the confidence of the Palestinian people and possibly erode some of the popular support for militant factions. However, this will not be enough. The PA will have to contend with the security threat posed by terrorist organizations and illegal militias. The PASF will require new units, training, equipment, and intelligence capabilities. Additionally, in order to sustain the support of the Palestinian society, USSC efforts must be integrated with those of other government agencies to improve social, economic, health, and educational conditions.⁷⁷

In the coming years, the USSC should be given the authorities and resources to reinforce PASF counter-terrorism capacity building training, in addition to law and order and civil disturbance control. After years of investment by the USSC to gain the trust and confidence of the Palestinian and Israeli leadership, it would be unwise to transfer this mission to another department or agency. However, as a DoD organization, the USSC is restricted from providing certain types of training to foreign counter-terrorism forces, police units, and intelligence agencies.⁷⁸

With the expanded mission to build counter-terrorism capability within the PASF, the U.S. needs to reestablish the CJTF as a Joint Interagency Task Force (JIATF).⁷⁹ Once the PA commits itself to combating terrorism, the U.S. must be postured to reinforce all elements of their government. A JIATF alleviates some problems caused by certain DoD restrictions. The JIATF, recognized as the lead agent for security capacity building and counter-terrorism, would be able to access the capabilities and resources of non-security related departments and agencies within our government.⁸⁰

For factions willing to disarm and demobilize, the PA will need help during the reconciliation process. For irreconcilable militant organizations, the PA will require assistance in creating strong military, police, intelligence, and judicial capabilities and infrastructure. Additionally, the PA will require the support of non-DoD agencies to assist in providing meaningful health, education, and economic incentives to maintain the support of the Palestinian people. Therefore, if a JIATF is considered, the U.S. should consider establishing it as a Combined JIATF (CJIATF) for the same reasons a CJTF was recommended previously.⁸¹

The U.S. should establish an intelligence analysis and information sharing system within the JIATF to assist Palestinian counter-terrorism operations. Palestinian security forces will require support to locate and track the terrorist threat that resides within its borders, as well as the threat posed by foreign nations and non-state organizations. Without robust assistance, these operations will quickly exceed the capability of the Palestinian intelligence services. The U.S. has learned during the past twelve years of countering terrorism that we can only be effective through combined

efforts and intelligence sharing within our own government and in cooperation and coordination with our partners and allies.⁸²

Recommendations for the long-term: after a stable and secure environment is established and the Palestinian Authority and Israeli governments reach a lasting peace agreement, DoD assistance will still be required. The U.S. is currently preparing to transfer certain DoD programs and activities in Afghanistan to the DoS, as it did in Iraq. Similarly, some of the JIATF efforts will be transferred once stability and peace are achieved. While the Palestinian Authority will need extensive support in establishing a functioning government and economy, these activities will clearly belong to DoS.⁸³

The future Palestinian State will continue to be subject to the influence and threats from other states and external non-state actors. Palestine will likely become the target of violence, just as happened to Egypt and Jordan following their peace agreements with Israel. Additionally, these external actors will continue to attempt to use Palestine as a staging ground for attacks against Israel. The Palestinian government and security forces will require DoD assistance for many years to come.⁸⁴

Only after a final peace agreement is reached between Israel and a new Palestinian State, can DoD establish an enduring ODC with a permanent training assistance component. Or when the internal or external security threat to a partner nation is excessive, or when the need exists for extensive and continual security cooperation, DoD can establish a more robust, permanent presence in the form of an Office of Military Cooperation (OMC). An OMC for a Palestine state need not be as large as the 800-man U.S. Military Training Mission Saudi Arabia or an OMC in

Kuwait.⁸⁵ Nonetheless, DoD must be prepared to maintain a sizeable security assistance presence in Palestine comparable to the Office of Security Cooperation-Iraq.

In conclusion, the Palestinian government and society have a tremendously difficult journey ahead as they strive for full statehood. Without a credible Palestinian-Israeli peace process, Palestinians will be stuck in their long and tenuous attempt to build a state while still under occupation.⁸⁶ To stay the course, they will require partners who are dedicated to providing the required assistance needed. Only the U.S. has the means to organize and sustain the international effort that will be required. Likewise, only DoD has the resources and expertise to ensure the permanence of the security assistance effort. However, the current effort will not carry us through to a Two-State Solution. The opportunity exists now to set the conditions for these future requirements and ensure that the U.S. is ready to respond when needed.⁸⁷

Just as a final resolution must be the mutual creation of the Israeli and the Palestinian governments and people, so too must the shared security of each nation. The U.S. government cannot force a peace arrangement upon these two governments. Likewise, the U.S. must resist the temptation to press for changes before both Israelis and Palestinians are willing and able to accept the associated risks. As stated earlier, the peace process is a delicate balance of security, patience, and trust. Any attempt by the U.S. to seize control of the security agenda, for any reason, will be a breach of trust against our partners from which U.S. relationships with those partners might not recover.⁸⁸

Endnotes

¹ Jim Zanotti, *The Palestinians: Background and U.S. Relations: A CRS Report for Congress* (Washington, DC: U.S. Congressional Research Service, August 17, 2012), 5.

² Alan Dershowitz, *The Case for Israel* (Hoboken, New Jersey: John Wiley and Sons, Inc., 2003), 32-38.

³ Thomas J. Kardos, *Toward A Two-State Solution: Expanding U.S. Military Assistance to Palestinian Security Forces*, Strategy Research Project (Carlisle Barracks, PA: U.S. Army War College, March 23, 2010), 1.

⁴ Ibid.

⁵ Ibid. 2.

⁶ Jim Zanotti, *U.S. Foreign Aid to the Palestinians: A CRS Report for Congress* (Washington, DC: U.S. Congressional Research Service, June 15, 2012), 1.

⁷ Lieutenant General Keith Dayton, "Peace through Security," lecture, The Washington Institute for Near East Policy, Washington, DC, May 7, 2009.

⁸ Bernard Reich, *A Historical Encyclopedia of the Arab-Israeli Conflict* (Westport, CT: Greenwood Press, 1996), 272.

⁹ Baylis Thomas, *How Israel Was Won: A Concise History of the Arab-Israeli Conflict* (New York: Lexington Books, 1999) 22.

¹⁰ Yaacov Lozowick, *Right to Exist* (New York: Doubleday-Random House Inc., 2003), 48, 61, and Dershowitz, 33.

¹¹ Reich, 246-248.

¹² Deborah J. Gerner, *One Land, Two Peoples: The Conflict Over Palestine* (Boulder, Colorado: Westview Press, 1991), 50-54.

¹³ Thomas, 95-97.

¹⁴ Ibid. 88.

¹⁵ Gerner, 46.

¹⁶ Ilan Pappé, *A History of Modern Palestine: One Land, Two People* (New York: Cambridge University Press, 2004), 188-207.

¹⁷ Aaron David Miller, *The Much Too Promised Land: America's Elusive Search for Arab-Israeli Peace* (New York: Bantam Dell-Random House Inc., 2008), 145.

¹⁸ Gerner, 124-125.

¹⁹ David W. Lesch, ed., *The Middle East and the United States: A Historical and Political Reassessment*, 4th ed. (Boulder, Colorado: Westview Press, 2007), 175.

²⁰ Lozowick, 175.

²¹ Alan R. Taylor, *The Superpowers and the Middle East* (Syracuse, New York: University of Syracuse Press, 1991), 173, 104.

²² Tamara Cofman Wittes, ed., *How Israelis and Palestinians Negotiate: A Cross-Cultural Analysis of the Oslo Peace Process* (Washington, DC: United States Institute of Peace Press, 2005), 23.

²³ Lesch, 240.

²⁴ Thomas, 263.

²⁵ Since August 2005, the administration of Palestinian territories by the Israeli government has been performed by the Office of the Coordinator of Government Activities in the Territories (COGAT) for the West Bank, and Coordination and Liaison Administration for the Gaza Strip.

²⁶ Daniel C. Kurtzer and Scott B. Lasensky, *Negotiating Arab-Israeli Peace: American Leadership in the Middle East* (Washington, DC: United States Institute of Peace Press, 2008), 9-10.

²⁷ Dayton, "Peace through Security".

²⁸ Paul Morro, *U.S. Foreign Aid to the Palestinians: A CRS Report for Congress* (Washington, DC: U.S. Congressional Research Service, October 9, 2007) 2.

²⁹ Jim Zanotti, *U.S. Security Assistance to the Palestinian Authority: A CRS Report for Congress* (Washington, DC: U.S. Congressional Research Service, January 8, 2010) 5.

³⁰ Morro, 2.

³¹ Ibid.

³² Ibid., 5-6.

³³ Mitchell G. Bard, *Myths and Facts: A Guide to the Arab-Israeli Conflict* (Chevy Chase, Maryland: American-Israeli Cooperative Enterprise, 2006), 335.

³⁴ Kurtzer, 163-164.

³⁵ Talley Helfont, "Palestinian security Reform: A Moment of Truth," June 2009, linked from *Foreign Policy Research Institute Homepage* at <http://www.fpri.org/enotes/200906.helfont.palestiniansecurity.html> (access December 7, 2012)

³⁶ Dayton, "Peace through Security."

³⁷ Morro, 5.

³⁸ Lieutenant General Keith Dayton, "Report of the U.S. Security Coordinator," prepared statement, Senate Foreign Relations Committee, Washington, DC, March 15, 2006.

³⁹ Zanotti (2010), 1.

⁴⁰ David Bedein and Arlene Kushner, *The Implications of United States Training of Palestinian Security Forces* (Washington, DC: The Center for Near East Policy Research, Ltd., 2009), 6.

⁴¹ Zanotti (2010), 7.

⁴² Dayton, "Peace through Security."

⁴³ Ibid.

⁴⁴ Zanotti (2010), 14.

⁴⁵ Ibid., 14-15.

⁴⁶ Ibid., 15.

⁴⁷ Jim Zanotti, *U.S. Foreign Aid to the Palestinians: A CRS Report for Congress* (Washington, DC: U.S. Congressional Research Service, June 15, 2012), 11.

⁴⁸ Ibid., 6.

⁴⁹ Ibid., 15.

⁵⁰ Dayton, "Peace through Security."

⁵¹ Ibid.

⁵² Zanotti (2010), 20-21.

⁵³ Jim Zanotti, *U.S. Foreign Aid to the Palestinians: A CRS Report for Congress* (Washington, DC: U.S. Congressional Research Service, June 15, 2012), 15.

⁵⁴ Dayton, "Peace through Security."

⁵⁵ Zanotti (2010), 22.

⁵⁶ Bedein and Kushner, *Implications*, 15.

⁵⁷ Jim Zanotti, *U.S. Foreign Aid to the Palestinians: A CRS Report for Congress* (Washington, DC: U.S. Congressional Research Service, June 15, 2012), 16.

⁵⁸ Khaled Abu Toameh, "How Journalists Allowed the Palestinian Authority to Fool Them," Gatestone Institute International Policy Council, May 9, 2012.
<http://www.gatestoneinstitute.org/3053/jenin-security> (accessed January 17, 2013)

⁵⁹ Karin Brulliard, "Drama in West Bank city of Jenin shows cracks in Palestinian nation-building project," Washington Post, May 25, 2012.

⁶⁰ Ibid.

⁶¹ Ali Sawafta and Noah Browning, "Palestinian Authority cracks down in West Bank town," Reuters, June 4, 2012.

⁶² Lieutenant General Michael R. Moeller, Statement of United States Security Coordinator for Israel and the Palestinian Authority before the House Foreign Affairs Subcommittee on the Middle East and South Asia, July 12, 2011.

⁶³ See Morro, Zanotti (2010), as well as, J.D. Crouch, Montgomery C. Miegs, and Walter B. Slocombe, "Security First," *Washington Post*, January 12, 2009.

⁶⁴ U.S. Joint Chiefs of Staff, *Department of Defense Dictionary of Military and Associated Terms* (Washington, DC: U.S. Joint Chiefs of Staff, November 8, 2010, as amended December 15, 2012), 310.

⁶⁵ Moeller, 2011.

⁶⁶ Thomas J. Kardos, *Toward A Two-State Solution: Expanding U.S. Military Assistance to Palestinian Security Forces*, Strategy Research Project (Carlisle Barracks, PA: U.S. Army War College, March 23, 2010), 16.

⁶⁷ "Defense Attaché Office," <http://london.usembassy.gov/dao/index.html>. (Accessed 21 January 2013).

⁶⁸ "Offices of Defense Cooperation," January, 21 2013, <http://www.eucom.mil/organization/command-structure/odc>. (Accessed January 21, 2013)

⁶⁹ Thomas J. Kardos, *Toward A Two-State Solution: Expanding U.S. Military Assistance to Palestinian Security Forces*, Strategy Research Project (Carlisle Barracks, PA: U.S. Army War College, March 23, 2010), 16.

⁷⁰ Ibid.

⁷¹ Ibid., 17.

⁷² Ibid.

⁷³ International Crisis Group, *Squaring the Circle: Palestinian Security Reform Under Occupation*, September 7, 2010, <http://www.crisisgroup.org/en/regions/middle-east-north-africa/israel-palestine/98-squaring-the-circle-palestinian-security-reform-under-occupation.aspx>. (Accessed January 21, 2013), 16-25.

⁷⁴ U.S. Joint Chiefs of Staff, *Department of Defense Dictionary of Military and Associated Terms*, Joint Publication 1-02 (Washington, DC: U.S. Joint Chiefs of Staff, November 8, 2010, as amended December 15, 2012), 166.

⁷⁵ Thomas J. Kardos, *Toward A Two-State Solution: Expanding U.S. Military Assistance to Palestinian Security Forces*, Strategy Research Project (Carlisle Barracks, PA: U.S. Army War College, March 23, 2010), 19.

⁷⁶ Ibid.

⁷⁷ International Crisis Group, *Squaring the Circle: Palestinian Security Reform Under Occupation*, September 7, 2010, <http://www.crisisgroup.org/en/regions/middle-east-north-africa/israel-palestine/98-squaring-the-circle-palestinian-security-reform-under-occupation.aspx>. (Accessed January 21, 2013), 37-39.

⁷⁸ U.S. Joint Chiefs of Staff, *Department of Defense Dictionary of Military and Associated Terms*, Joint Publication 1-02 (Washington, DC: U.S. Joint Chiefs of Staff, November 8, 2010, as amended December 15, 2012), 159.

⁷⁹ Thomas J. Kardos, *Toward A Two-State Solution: Expanding U.S. Military Assistance to Palestinian Security Forces*, Strategy Research Project (Carlisle Barracks, PA: U.S. Army War College, March 23, 2010), 20.

⁸⁰ *Ibid.*, 21.

⁸¹ *Ibid.*

⁸² *Ibid.*, 22.

⁸³ *Ibid.*

⁸⁴ International Crisis Group, *Squaring the Circle: Palestinian Security Reform Under Occupation*, September 7, 2010, <http://www.crisisgroup.org/en/regions/middle-east-north-africa/israel-palestine/98-squaring-the-circle-palestinian-security-reform-under-occupation.aspx>. (Accessed January 21, 2013), 39-40.

⁸⁵ Bureau of Near Eastern Affairs, "U.S. Relations with Kuwait," October 24, 2012, <http://www.state.gov/r/pa/ei/bgn/35876.htm>. (Accessed January 21, 2013).

⁸⁶ International Crisis Group, *Squaring the Circle: Palestinian Security Reform Under Occupation*, September 7, 2010, <http://www.crisisgroup.org/en/regions/middle-east-north-africa/israel-palestine/98-squaring-the-circle-palestinian-security-reform-under-occupation.aspx>. (Accessed January 21, 2013), iii.

⁸⁷ Thomas J. Kardos, *Toward A Two-State Solution: Expanding U.S. Military Assistance to Palestinian Security Forces*, Strategy Research Project (Carlisle Barracks, PA: U.S. Army War College, March 23, 2010), 23.

⁸⁸ *Ibid.*